

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

NATIONAL EDUCATION
ASSOCIATION, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION, *et al.*,

Defendants.

Case No. 25-cv-00091-LM

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Plaintiffs submit the attached supplemental declaration of NEA Member A in support of their motion for summary judgment, ECF 81.

NEA Member A ("Member A") previously submitted a declaration in support of Plaintiffs' Motion for a Preliminary Injunction, ECF 34-11, and submitted the same declaration in support of Plaintiffs' Motion for Summary Judgment, ECF 81-36.

Member A recently changed positions, shifting from a high school English teacher to an Eighth Grade English Language Arts teacher at a different school. Member A has remained an NEA and NEA-NH member, and this change does not substantively alter his claims in the case. Member A's declaration memorializing these changes is attached.

Plaintiffs will separately submit an assented-to motion to seal Member A's declaration at Level II.

Dated: July 3, 2025

Respectfully submitted,

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